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7 Attorneys for Defendant
TIMOTHY DUPUIS, in his official capacity as
8 the Alameda County Registrar of Voters

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**
11

12 PUBLIC INTEREST LEGAL
FOUNDATION, INC.,

13 Plaintiff,

14 v.

15 TIMOTHY DUPUIS, in his official capacity
16 as the Alameda County Registrar of Voters,

17 Defendant.
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Case No. 4:24-cv-00679-HSG

**UPDATED JOINT CASE MANAGEMENT
STATEMENT & [PROPOSED] ORDER**

The Hon. Haywood S Gilliam, Jr

Trial Date: None Set

1 Plaintiff Public Interest Legal Foundation, Inc. (“Plaintiff”) and Timothy Dupuis, in his
2 official capacity as the Alameda County Registrar of Voters (the “County of Alameda”) jointly
3 submit this Updated Joint Case Management Statement & Proposed Order pursuant to the Court’s
4 Minute Entry order following the parties’ May 21, 2024 Case Management Conference (Dkt. 27).

5 **1. CASE STATUS UPDATE**

6 Since their last Case Management Conference on May 21, 2024, the parties have been
7 engaged in good faith and productive settlement discussions and efforts to resolve this matter.
8 Specifically:

- 9 • On or about July 25, 2024, the County of Alameda produced what it believes are all
10 of the requested records;
- 11 • The parties have reached a settlement in principle and are in the process of
12 preparing a written settlement agreement (“Anticipated Settlement”); and
- 13 • Under the terms of the Anticipated Settlement, this action will ultimately be
14 dismissed with prejudice by Plaintiff.

15 **2. PROPOSED NEXT STEPS**

16 Given that the parties have agreed to a settlement in principle, the parties respectfully
17 propose and request that the Court continue the August 13, 2024 Case Management Conference by
18 approximately 60 days, at which point, the Action should be fully resolved, obviating the need for
19 utilizing the Court’s resources for any further proceedings besides processing any request for
20 dismissal of this case. The parties believe that 60 days is an appropriate extension to provide
21 sufficient time for the parties to finalize the written settlement agreement, obtain necessary
22 approval of such by the County, and to effectuate the other settlement terms.

1 DATED: August 7, 2024

MEYERS NAVE

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3 By: /s/ David Mehretu
4 DEBORAH J. FOX
5 DAVID MEHRETU
6 Attorneys for Defendant
7 TIMOTHY DUPUIS, in his official capacity as the
8 Alameda County Registrar of Voters

9 DATED: August 7, 2024

10 By: /s/ Maureen Riordan
11 KAYLAN PHILLIPS*
12 MAUREEN RIORDAN, ESQ.*
13 *Admitted Pro Hac Vice pursuant to Civil L.R. 11-
14 3
15 Attorneys for Plaintiff
16 PUBLIC INTEREST
17 LEGAL FOUNDATION, INC.
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[PROPOSED] ORDER

The Court, having read and considered the Parties' Supplemental Joint Case Management Statement, and good cause appearing therefore, ORDER as follows:

The Case Management Conference in this case is continued, by approximately 60 days, to _____ set before this Court in the Oakland Courthouse, Courtroom 2, Fourth Floor, at _____ a.m./ p.m.

IT IS SO ORDERED.

Dated:

Hon. Haywood S Gilliam, Jr

UNITED STATES DISTRICT JUDGE

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